

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ELMER CAMPBELL, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION NO. C-1-01-527
)	
v.)	JUDGE: BECKWITH
)	MAGISTRATE JUDGE: HOGAN
INTERNATIONAL PAPER,)	
SUN CAPITAL PARTNERS, INC.,)	
SMART PAPERS,)	
)	
Defendants.)	
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DEFENDANT SMART PAPERS' MOTION FOR SUMMARY JUDGMENT

Defendant, Smart Papers, LLC ("Smart Papers"), pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 7.2, hereby moves this Court for summary judgment in its favor on Plaintiffs' Fifth Amended Complaint in its entirety. As shown in greater detail in Smart Papers' accompanying Memorandum of Law, there are no genuine issues of material fact in dispute to warrant a trial by jury and summary judgment should be granted to Smart Papers as a matter of law.

Respectfully Submitted,

/s Robert J. Hollingsworth / by Stanley F. Lechner
per telephone permission
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Dated: September 30, 2003